

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

Leontas Gabie Bey

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Lt. Esposito Badg # 27
et alia Providence Police
Department et alia

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Claim
Complaint 2019 CIVIL R 3-20

Case No. _____

(to be filled in by the Clerk's Office)

Jury Trial: Yes No

(check one)

CA 19- 535

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Leontine Jaber Bey</u>
Street Address	<u>23 Acorn St Providence</u>
City and County	<u>Providence</u>
State and Zip Code	<u>Rhode Island 02903</u>
Telephone Number	<u>617-480-9025</u>
E-mail Address	

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	<u>Lt. Esposito Badge #27</u>
Job or Title (if known)	<u>Lieutenant</u>
Street Address	<u>325 Washington St</u>
City and County	<u>Providence RI</u>
State and Zip Code	<u>Rhode Island 02903</u>
Telephone Number	
E-mail Address (if known)	

Defendant No. 2

Name	<u>Diaz Badge # 320</u>
Job or Title (if known)	
Street Address	<u>"</u>
City and County	<u>"</u>

State and Zip Code " "

Telephone Number _____

E-mail Address _____

(if known)

Defendant No. 3

Name chatman

Job or Title Badge # 283
(if known)

Street Address "

City and County "

State and Zip Code "

Telephone Number _____

E-mail Address _____
(if known)

Defendant No. 4

Name chris

Job or Title Badge # 283
(if known)

Street Address "

City and County "

State and Zip Code "

Telephone Number "

E-mail Address _____
(if known)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

18 USC 241, Article 20, and 21 of the Treaty of Amity and Commerce of 1787 between The Empire of Morocco and the United States of America, 4th Amendment, 2nd, and 15th Amendments

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) Lorraine Jaber Bay, is a citizen of the State of (name) Morocco.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached Affidavit

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See Attached Affidavit

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/7/19, 2019.

Signature of Plaintiff

Printed Name of Plaintiff

LDB
Leonidas Jaber Bey A UCC 1-308

B. For Attorneys

Date of signing: _____, 20 ____.

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

Telephone Number _____

E-mail Address _____

CONTINUATION PAGES

The Defendant(s) - Continuation

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 5

Name	Chris
Job or Title (if known)	Badge # 206
Street Address)
City and County)
State and Zip Code)
Telephone Number	
E-mail Address (if known)	

Defendant No. 6

Name	Rosso
Job or Title (if known)	# 514
Street Address	
City and County	

Defendant No. 7

Name	Q Badge # 47
Job or Title (if known)	Sgt.
Street Address)
City and County)
State and Zip Code)
Telephone Number	
E-mail Address (if known)	

Eli Badge # 167
Seachelo Badge # 285

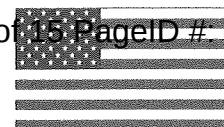
Defendant No. 8

Name	<u>Prote</u>
Job or Title (if known)	<u>Badge # 522</u>
Street Address	<u>)</u>
City and County	<u>)</u>

Statement of Claim - Continuation

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

See Attached Affidavit



Affidavit of Fact

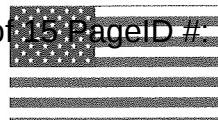
Date: 8 Safar 1441: [10 October, 2019]

Affiant: Amirah Amarilis Amaara Atiyah Bey

Address: RISE OF THE MOORS – 23 Acorn Street, 3rd Floor, Providence RI 02903

Notice to the agent is notice to the principal, notice to the principal is notice to the agent. UCC I -202: notice, knowledge. An instrument is deemed in law filed at the time it is delivered to the clerk. See *Biffle v. Morton Rubber, Inc.*, 785 S.W. 2d 143, 144 (tex. 1990).

On 6 Safar 1441, October 5th, 2019 (Gregorian Calendar) at about 2:45pm, Providence Municipal Police conspired to deprive us, the Moorish American Indigenous Peoples, of our pre-existing rights when they arrived at 23 Acorn St, Providence, Rhode Island [02903]. Grand Sheik Jamhal Talib Abdullah Bey stood up in concern mid-presentation to address a phone call he received. Being worried, I went down stairs and became fearful as I witnessed several Providence Municipal Police members stacked one behind the other in what appeared to be preparation for a raid. As I went back inside, we agreed to have a peaceful conversation with the police members to gain clarity of why they were present. In violation of Article 1 Section 6 of the Rhode Island State Constitution and the 5th Amendment of the Constitution for the united States of 1791, no written complaint was presented and instead Municipal Police stated they were there under pretenses of an “investigation”. Furthermore, they made claims of receiving a phone call, from a third party, alleging to have seen an automatic rifle during the online presentation of our Religious, Law and History class. Hereby, infringing on our pre-existing religious rights to a peaceful assembly and the right to keep and bear arms, per the 1st and 2nd Amendment of the Constitution for the united States of 1791 and Article 1 Section 21 & 22 of the Rhode Island State Constitution. Upon clarification of any and all confusion in regards to the alleged claims, and confirming we were Moorish American Nationals, we assured Providence Municipal Police that no such weapons were in our possession and that everyone was safe. The Providence Municipal Police continued to ask questions, already answered, and advanced to call for more units in violation of their ethical code of conduct, per Article 3 Section 7 and 8, with the intent to violate our rights by force. At this time I felt threatened and harassed and requested for a Sheriff to be present. I was told, “ ..there is no Sheriff, Providence police is all you get..”. In addition to the harassment, unmarked vehicles



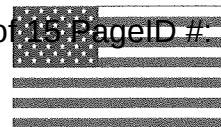
arrived at the scene and un-uniformed police members approached and surrounded us, making me feel in danger for my life. Providence Municipal Police treated me under colorable law which is unlawful per Title 18, U.S.C., Section 241 & 242 and a direct violation of the Peace and Friendship Treaty of 1786 between Morocco and the U.S. Finally, Municipal Police agreed that they had no standing to be present at above referenced location and that they would investigate the number that called in and created this situation to occur.

In conclusion, I am hereby making the claim that the Providence Municipal Police Department knowingly and intentionally conspired to deprive me and the other Moorish Nationals of our preexisting constitutional rights based on the following;

1. The Providence Police Department knowingly and intentionally conspired to deprive me and the other Moorish Nationals of our rights secured by Article 1 section 6 of the Rhode Island State Constitution and the 4th Amendment of the Constitution for the united States of America, by attempting to unlawfully breach, search and clear the building that we were having class in, without a warrant signed by a judge and without a written statement of claim made against us. Which both constitutions state the following:

Art 1 Sec 6: The right of the people to be secure in their persons, papers and possessions, against unreasonable searches and seizures shall not be violated; and no warrant shall issue, but on complaint in writing, upon probable cause, supported by oath or affirmation, and describing as nearly as may be, the place to be searched and the persons or things to be seized.

4th Amendment: The right of the people to be secure in their persons, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrant shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.



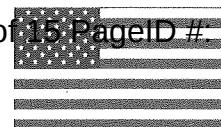
2. The Providence Police Department knowingly and intentionally conspired to deprive me and the other Moorish Nationals of our rights secured by Article 1 section 22 of the Rhode Island State Constitution and the 2nd Amendment of the Constitution for the united States of America, by attempting to unlawfully breach, search and clear the building that we were having class in, without a warrant signed by a judge and without a written statement of claim made against us, and take away any arms that they stated were in the building. Both constitutions state the following:

Art 1 sec 22: The right of the people to keep and bare arms shall not be infringed.

2nd Amendment: A well-regulated militia, being necessary to the security of a free state, the right of the people to keep and bare arms shall not be infringed.

3. The Providence Police Department knowingly and intentionally conspired to deprive me and the other Moorish Nationals of our rights secured by Article 1 section 3 of the Rhode Island State Constitution and the 1st Amendment of the Constitution for the united States of America by attempting to unlawfully breach, search and clear the building that we were having class in, without a warrant signed by a judge and without a written statement of claim made against us and put an end to our religious meeting and peaceful assembly while baring arms, which baring arms is no probable cause. Both constitutions state the following:

Article 1 section 3: Freedom of religion: Whereas Almighty God hath created the mind free; and all attempts to influence it by temporal punishments or burdens, or by civil incapacitations, tend to beget habits of hypocrisy and meanness; and whereas a principal object of our venerable ancestors, in their migration to this country and their settlement of this state, was, as they expressed it, to hold forth a lively experiment that a flourishing civil state may stand and be best maintained with full liberty in religious concerns; we, therefore, declare that no person shall be compelled to frequent or to support any religious worship, place, or



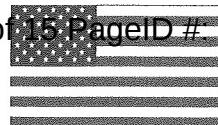
ministry whatever, except in fulfillment of such person's voluntary contract; nor enforced, restrained, molested, or burdened in body or goods; nor disqualified from holding any office; nor otherwise suffer on account of such person's religious belief; and that every person shall be free to worship God according to the dictates of such person's conscience, and to profess and by argument to maintain such person's opinion in matters of religion; and that the same shall in no way diminish, enlarge, or affect the civil capacity of any person.

1st Amendment: Congress shal make no law respecting an establishment of religion, or prohibiting the free exercise thereof; or abridging the freedom of speech, or of the press; or the right of the people peaceably to assemble; and to petition the government for a redress of grievances.

4. The Providence Police Department knowingly and intentionally violated the State and Federal constitutions specifically Article 6 of the Federal constitution and Article 3 (diversity) of the State constitution, both of which state that the constitution is the supreme law of the land, including all treaties made, and that all persons in the position in public office must take an oath to said constitution. The violation occurred when we stated that we were Moorish American nationals to the Providence Police and they continued to attempt to exercise personam, subject-matter and territorial jurisdiction. Meaning, since we stated our national origin, the issue of diversity is primal and the municipal police should have known that they lacked jurisdiction and pursuant to their oath of ethics as stated in the RI Con, Art 3 sec 7 & 8, they were to report to the Mayor that they were in contact with a foreign nation so that the Mayor could notify the chain of command; being the State and the State was to then notify the Federal government of the issue of diversity pursuant to Article 6 and Article 1 section 10 of the Federal constitution. Article 20 and 21 of the Treaty of Amity and Commerce between the Moroccan Empire and the united States of America of 1787, the Act of State Doctrine, the United Nations Declaration on the Rights of Indigenous People, et alia.



Treaty of Peace and Friendship of 1787 between the Empire of Morocco and the United States.



Remedy, settlement and or relief is sought for the aforementioned injuries / tort in the form of 1 million dollars in lawful money, a written and public apology with the Mayor and Chief of Police present, to include all of the municipal agents of the Providence police department who was present on the date of the incident.

UNDER PENALTY OF PERJURY

Under penalty of perjury and persecution from the Moorish nation, do declare and state for the record, to the best of my ability, that all claims and statements made in this affidavit are true, factually based and not made for, nor intended to be used for fraud, misrepresentation, misprision nor usurpation. A Free Moorish American national and citizen of the free National Government of Morocco, I am: Amirah Amaris Amara Styxh Bey. In honor of my Moabite ancestors to time immemorial, exercising the Divine and Common-Law-Right to Jus Postliminii, in accord with the high principles of Love, Truth, Peace, Freedom and Justice.

Witness: Leoritus Jolir Bey

Witness: Samukka Hamlet Bey

